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*By ECF*

Hon. Analisa Torres, U.S.D.J.  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Furet v. City of New York, et al.*  
22 Civ. 3172 (AT) (SA)

Your Honor,

This office represents the plaintiff in the above-referenced action. I write on behalf of the parties to respectfully request a sixty (60) day enlargement of time to complete fact discovery, from January 5, 2024 to March 5, 2024, and an extension of the expert discovery deadline to March 19, 2024. The parties also respectfully request an adjournment of the case management conference currently scheduled for January 30, 2024 as Mr. Kalmbach, counsel for the City of New York and Detective Payano is beginning a trial on January 29<sup>th</sup> before Judge Ann M. Donnelly. Defendants consent to this request.

This is the parties' third request for an extension of the discovery deadlines. Your Honor previously extended these deadlines on June 22, 2023 and November 6, 2023. The reason for this request is that the depositions of the defendant officers, Detective Franco and Detective Payano, were held on November 16, 2023 and January 3, 2024, respectively. Detective Payano's deposition had been scheduled for November 14<sup>th</sup>; however, he was called away on business and was unable to appear on that date. Given Detective Payano and counsels' holiday schedules, January 3<sup>rd</sup> was the next available date. Now that party depositions have been completed, Plaintiff intends to subpoena Detective Mantilla, who also participated in Plaintiff's arrest, for a non-party deposition. Additionally, Plaintiff intends to serve post-deposition discovery requests.

The parties have worked together amicably and diligently to complete discovery, but more time is needed. For the reasons stated above, the parties respectfully request a 60-day extension of the discovery deadlines and an adjournment of the January 30, 2024 case management conference.

I thank the Court for its time and consideration of this request.

GRANTED. The case management conference scheduled for January 30, 2024, is adjourned *sine die*.

SO ORDERED.

Dated: January 5, 2024  
New York, New York

ANALISA TORRES  
United States District Judge